

To: Russ, Timothy[Russ.Tim@epa.gov]; Daly, Carl[Daly.Carl@epa.gov]; Jackson, Scott[Jackson.Scott@epa.gov]; Bohan, Suzanne[bohan.suzanne@epa.gov]; Distler, Kenneth[DISTLER.KENNETH@EPA.GOV]; Laumann, Sara[Laumann.Sara@epa.gov]
From: Coda, Tom
Sent: Thur 5/23/2013 8:28:23 PM
Subject: RE: BLM Proposed General Conformity Exempt List (from Email dated 5/17/13)

Tim,

Ex. 5 - Deliberative Process

Tom

From: Russ, Timothy
Sent: Thursday, May 23, 2013 3:47 PM
To: Daly, Carl; Jackson, Scott; Bohan, Suzanne; Distler, Kenneth; Laumann, Sara; Coda, Tom
Subject: BLM Proposed General Conformity Exempt List (from Email dated 5/17/13)

Hi Everyone,

I have given a brief review to the attached BLM Word document “Conformity Exemption List Based on 40 CFR 93 Section 153 (2)” and offer the following comments for consideration:

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From the “Production” spreadsheet and the (tons) are in Tons Per Year.

Sources	PM2.5		PM10		NO _x		VOCs	
	(lb/hr)	(tons)	(lb/hr)	(tons)	(lb/hr)	(tons)	(lb/hr)	(tons)
Stationary Engines	3.48	9.27	10.20	38.40	69.97	205.55	23.28	63.61
Heaters	41.66	55.87	41.66	55.87	548.12	735.07	30.15	40.43
Tanks	0.00	0.00	0.00	0.00	19.60	85.73	395.351	316.67
Dehydration Units	0.00	0.00	0.00	0.00	100.37	430.36	826.293	192.30
Pneumatics	0.00	0.00	0.00	0.00	54.92	126.70	1,652.564	462.38
Fugitives	0.00	0.00	0.00	0.00	0.00	0.00	770.623	375.34
Venting & Blowdown	0.00	0.00	0.00	0.00	31.34	0.02228	28,803.16	923.05
Drill Rigs	105.18	22.63	110.01	24.72	2,083.80	491.89	127.59	43.18
Completions	340.10	19.19	380.31	22.77	12,210.76	780.68	2,307.82	106.52

C.) I also gave a brief review to the State's document regarding oil and gas facilities permitting (thanks to Ken Distler for providing and please see the attached .pdf file entitled "March 2010 final Oil and Gas Guidance"). This document addresses WYDEQ permitting requirements for certain oil and gas processes and operations.

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guidance document.

Below are excerpts from the 2010 State

Well Completions

Operators shall submit applications to perform well completions using **Best Management Practices**. One permit will be issued to each company that drills and completes wells within the JPAD area. The permits will be modeled after those issued to companies completing wells in the Jonah and Pinedale Anticline Development Area. An example of a well completions or "Green Completions" permit is available on the AQD website, <http://deq.state.wy.us/aqd> or a copy may be obtained by contacting the Wyoming Air Quality Division at (307) 777-7391 or (307) 473-3475.

Green Completion permit applications shall be filed with the Division by November 1, 2010.

Blow down/Venting

Best Management Practices (BMP) and information gathering requirements will be incorporated into permits for new and modified facilities.

BMP: During manual and automated blow down/venting episodes associated with liquids unloading, wellbore depressurization in preparation for maintenance or repair, hydrate clearing, emergency operations, equipment depressurization, etc., associated VOC and HAP emissions shall be minimized to the extent practicable. During manual blow down or venting, personnel shall remain on site to ensure minimal gas venting occurs.

Information Gathering: Specific recordkeeping and reporting requirements will be established during the permitting process and will include estimates of associated regulated air pollutants, reasons for episodes, durations of episodes, steps taken to minimize emissions and descriptions of emission estimation methods.

For companies with existing facilities as of the date of this Guidance, blow down and venting permit applications shall be filed by November 1, 2010.

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Please let me know if you have any questions (and do let me know of any errors or omissions in my draft comments above!)

Thanks!

Tim

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From: Jackson, Scott
Sent: Friday, May 17, 2013 3:46 PM
To: Russ, Timothy
Cc: Daly, Carl
Subject: FW: General Conformity Exempt List

FYI.

Scott Jackson, Unit Chief

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From: Tuers, Charis [<mailto:ctuers@blm.gov>]
Sent: Friday, May 17, 2013 3:33 PM
To: Brian Hall; Darla Potter; Tina Anderson; Steve Dietrich; Bohan, Suzanne; Distler, Kenneth; Jackson, Scott
Cc: Green, Buddy W; Martin Griffith; Gamper, Merry E
Subject: General Conformity Exempt List

Referred to BLM

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